

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
JOSE SANCHEZ, a/k/a "SOFT," JOEL MARTINEZ	:	VIOLATIONS:
	:	21 U.S.C. § 841(a)(1) (distribution of cocaine - 3 counts)
	:	21 U.S.C. § 860(a) (distribution of cocaine in school zone - 3 counts)
	:	21 U.S.C. § 841(a)(1) (possession of cocaine with intent to distribute - 1 count)
	:	21 U.S.C. § 841(a)(1) (distribution of cocaine base ("crack") - 2 counts)
	:	21 U.S.C. § 860(a) (distribution of cocaine base ("crack") in school zone - 2 counts)
	:	18 U.S.C. § 2 (aiding and abetting) Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about September 28, 2007, in Philadelphia, in the Eastern District of Pennsylvania, defendant

JOSE SANCHEZ,
 a/k/a "Soft,"

knowingly and intentionally distributed a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 28, 2007, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**JOSE SANCHEZ,
a/k/a "Soft,"**

knowingly and intentionally distributed a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, within 1000 feet of real property comprising the Saint Anne School, a private elementary school, in Philadelphia, Pennsylvania, in violation Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

In violation of Title 21, United States Code, Section 860(a).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 11, 2007, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

**JOSE SANCHEZ,
a/k/a "Soft,"**

knowingly and intentionally distributed a mixture and substance containing a detectable amount of
cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 11, 2007, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

**JOSE SANCHEZ,
a/k/a "Soft,"**

knowingly and intentionally distributed 5 grams or more, that is, approximately 26 grams, of a mixture
and substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled
substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 11, 2007, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

**JOSE SANCHEZ,
a/k/a "Soft,"**

knowingly and intentionally distributed a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, within 1000 feet of real property comprising the Saint Anne School, a private elementary school, in Philadelphia, Pennsylvania, in violation Title 21, United States Code, Sections 841(a)(1), (b)(1)(C).

In violation of Title 21, United States Code, Section 860(a).

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 11, 2007, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

**JOSE SANCHEZ,
a/k/a "Soft,"**

knowingly and intentionally distributed 5 grams or more, that is, approximately 26 grams, of a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, within 1000 feet of real property comprising the Saint Anne School, a private elementary school, in Philadelphia, Pennsylvania, in violation Title 21, United States Code, Sections 841(a)(1), (b)(1)(B).

In violation of Title 21, United States Code, Section 860(a).

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 27, 2007, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

**JOSE SANCHEZ,
a/k/a "Soft,"**

knowingly and intentionally possessed with intent to distribute 500 grams or more, that is,
approximately 749 grams, of a mixture and substance containing a detectable amount of cocaine,
a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B).

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 13, 2007, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

**JOSE SANCHEZ,
a/k/a "Soft,"**

knowingly and intentionally distributed a mixture and substance containing a detectable amount of
cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 13, 2007, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**JOSE SANCHEZ,
a/k/a "Soft,"**

knowingly and intentionally distributed a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, within 1000 feet of real property comprising the Stephen A. Douglas High School, a public high school in Philadelphia, Pennsylvania, in violation Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

In violation of Title 21, United States Code, Section 860(a).

COUNT TEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 4, 2008, in Philadelphia, in the Eastern District of Pennsylvania,
defendants

**JOSE SANCHEZ,
a/k/a "Soft," and
JOEL MARTINEZ,**

knowingly and intentionally distributed, and aided and abetted the distribution of, 50 grams or more,
that is, approximately 61 grams, of a mixture and substance containing a detectable amount of cocaine
base ("crack"), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A), and Title 18,
United States Code, Section 2.

COUNT ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 4, 2008, in Philadelphia, in the Eastern District of Pennsylvania,
defendants

**JOSE SANCHEZ,
a/k/a "Soft," and
JOEL MARTINEZ,**

knowingly and intentionally distributed, and aided and abetted the distribution of, 50 grams or more, that is, approximately 61 grams, of a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, within 1000 feet of real property comprising the Stephen A. Douglas High School, a public high school in Philadelphia, Pennsylvania, in violation Title 21, United States Code, Section 841(a)(1), (b)(1)(A).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of violations of Title 21, United States Code, Section 841(a)(1), and 860(a), set forth in this indictment, defendants

**JOSE SANCHEZ,
a/k/a "Soft," and
JOEL MARTINEZ,**

shall forfeit to the United States of America:

(a) any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offenses, including, but not limited to:

(1) a black Dodge with PA tag # SHO IT OF; and

(2) a black Buick with PA tag #GXH-0538.

(b) any property constituting, or derived from, proceeds obtained directly or indirectly from the commission of such offenses, including, but not limited to, the sum of \$3,540.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third party;

(c) has been placed beyond the jurisdiction of the Court;

(d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 21, United States Code, Section 853.

A TRUE BILL:

FOREPERSON


LAURIE MAGID
United States Attorney